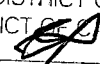


**FILED**

NOV 13 2024

CLERK U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY  DEPUTY CLERK

Kimby Arnold (Pro Se and Law Student)  
Roland Dunham II (Pro Se)  
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(510) 717-6208

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**


KIMBLY ARNOLD AND ROLAND  
DUNHAM II,

Plaintiff,

vs.

LION'S CLUB INT'L ASSOC., SUSAN  
FISHER, and DAVID KINGSBURY, PAM  
GRASHMA, FLORESIA ALLEN,  
MARYANN, SWEET POTATOES SOCIETY  
CORP., NEW LONDON COMMUNITY MEAL  
CENTER, CORP., MARYANN MARTINES,  
EXECUTIVE DIRECTOR; TRINA CHARLES,  
STEP UP CORPORATIONN,

Defendant

Case No.: 24 CV 01390 

**COMPLAINT FOR:**

- (1) VIOLATION OF CIVIL RIGHTS  
[42 U.S.C. § 1981]  
(2) VIOLATION OF FIRST  
AMENDMENT RIGHTS TO FREEDOM  
OF SPEECH WITH:  
(A) RESTRICTING SPEECH  
(B) (CONSTITUTIONAL STANDARD)  
(3) DEFAMATORY FALSEHOOD AND  
FALSITY

**DEMAND FOR JURY TRIAL**

**COMPLAINT**

Pro se Plaintiffs Kimby Arnold and Roland Dunham II hereby allege for their Amended  
Complaint with the following:

**PARTIES TO THIS COMPLAINT**

1. Plaintiff Kimby Arnold is an individual residing in Modesto, California. During the time  
period relevant to this pleading, Ms. Arnold was a member and cabinet secretary of the Lion's  
Club New London Black Heritage Club.

2. Plaintiff Roland Dunham II is an individual residing in New London, Connecticut

1 during the time period relevant to this pleading, Mr. Dunham was a member of Defendant Lion's  
2 Club International Association and served as founder and president of the Lion's Club New  
3 London Black Heritage Club, where a draft of this pleading was filed with the help of attorney in  
4 the Federal Pro Se Legal Assistance Program at New Haven Legal Assistance Association Case  
5 No. 23 cv 561 (SVN) which was dismissed without prejudice on November 10, 2023.  
6

7 3. Defendant Lion's Club International Association is a register corporation and or an  
8 association of a municipality of the state of Connecticut and may be served with process of  
9 service as resident at 366 Ash Street, Unit 13, Willimantic, Connecticut.  
10

11 4. Defendant Susan Fisher is an individual residing as a resident at 366 Ash Street, Unit 13,  
12 Willimantic, Connecticut. At the time period relevant to this pleading, Ms. Fisher was the  
13 District Governor of Defendant Lion's Club International Association.

14 5. Defendant David Kingsbury is an individual residing in the State of Illinois. During the  
15 time period relevant to this pleading, Mr. Kingsbury was general counsel of Defendant Lion's  
16 Club International Association whose address is located at 300 W 22<sup>nd</sup> Street, Lombard, IL  
17 90148, when the claim arose.  
18

19 6. Defendant Floresia V. Allen is an individual residing in New London, Connecticut.  
20 During the time period relevant to this pleading, Ms. Allen is a former member of the New  
21 London Black Heritage Club, who is the Founder of Sweet Potato Society Inc., located at 254  
22 Rocksberry Road, Niantic CT. 06357.  
23

24 7. Defendant MaryAnn Martinez is an individual residing in New London, Connecticut.  
25 During the time period relevant to this pleading, Ms. Martinez, was not a former member of the  
26 New London Black Heritage Club, or an Associate of the Defendant Lion, Club International-  
27  
28

1 LCI-The Defendant Mary Ann is the Executive Director of New London Community Meal  
2 Center located at 12 Montauk Avenue, New London, Ct. 06320.

3 8. Defendant Trina Charles is an individual who reside at 106 Truman Street, New London,  
4 Connecticut. -LCI During the time period relevant to this pleading, Ms. Charles was not a former  
5 member of the New London Black Heritage Club, or an Associate of the Defendant Lion  
6 International Association. The Defendant Ms. Charles, is the Executive Director of Step-Up -  
7 New London in New London, Ct.  
8

9  
10 **BASIS FOF JURISTIDITION**

11 9. This is an action to remedy Defendant's violation of Plaintiffs' civil rights in violation of  
12 42 U.S.C. § 1981, and Under 28 U.S.C. § 1331, were cause of action arises under the United  
13 States, Constitution and under federal laws; including the Plaintiff Kimbly Arnold, is an  
14 individual citizen of the State of California Under 28 U.S.C. § 1332, is also a case where diversity  
15 of citizenship exists between the defendants and the Plaintiffs.  
16

17 10. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331.

18 11. Venue is appropriate in this Court pursuant to 28 U.S.C. § 1391(b) because a substantial  
19 part of the acts and omissions giving rise to this Complaint took place in this district.

20 12. The amount in controversy-that the Plaintiffs Ms. Arnold and Mr. Dunham II, claim the  
21 Each Defendant owes is more than \$75,000.00 not counting interest, cost of preparation for  
22 litigation, documents, and service cost.  
23

24 **STATEMENT OF CLAIMS**

25 13. Plaintiff Kimbly Arnold is a Negro- Black American Women and was a member of  
26 the New London Black Heritage Club and the Defendant Lion's Club International Association for  
27 90 to 120 days -- before the Defendants revoked the Plaintiffs Ms. Arnold membership.  
28

1 14. The Plaintiff Ms. Arnold, became a member of the Lions Club by first paying her dues to  
2 Defendant Lion's Club International where Ms. Arnold, alleged contract agreement entitled her  
3 resolution dispute services, and other benefits under the membership contract with Lion's Club  
4 International Association.  
5

6 15. Ms. Arnold paid in dues to Defendant Lion's Club International where Mr. Dunham paid  
7 more than \$50,000.00 over his time as a member in good standing paid and earned the right to  
8 oversee the Black Heritage Club in New London charter in New London.  
9

10 16. Ms. Arnold, together with Mr. Dunham and the New London Black Heritage Club raised  
11 approximately \$10,000 in donations for various project to assist the Black community in Jackson  
12 Mississippi with water project forfeited, or collection for water contract with FEMA; or  
13 rescinded.  
14

15 17. On or about August 22, 2022, the Defendant Kingsbury wrongfully made the Plaintiffs a  
16 victim of Discriminatory Conduct against Ms. Arnolds, business with nonmembers of the Lions  
17 Club, the Defendant David Kingbury, had no right to include Ms. Arnold in complaint of misuse  
18 of Lion logo just because she was associated with the Plaintiff Roland Dunham." Who added the  
19 Plaintiff into his video" using the Defendants historical or outdated custom logo.  
20

21 18. On or about August 22, 2022, the Defendant Kingsbury, invidious discriminated or  
22 wrongfully excluded Ms. Arnold, from engaging with the public in order to uphold perceived race  
23 discriminatory practices.  
24

25 19. On or about August 22, 2022, Defendant David Kingsbury relied on unjustified assumption  
26 about The Plaintiff Ms. Arnold, efforts in providing volunteered humanitarian emergency services  
27 to the mentally ill person in California, as record the Defendants unjustified assumption that the  
28 Plaintiff Ms. Arnold, was engaging in the following wrongful conduct such as: (1) promoting her

1 business; and/or (2) personally benefiting off the mentally ill person situation; and/or (3) claiming  
2 that Ms. Arnold “appeared to be disclosing personal medical information” where the Plaintiffs was  
3 forced to remove the video violated Ms. Arnold First Amendment Rights to Freedom of Speech.  
4

5 20. On or about August 22, 2022, Defendant David Kingsbury, discrimination based on true  
6 Trademark Policy wrongfully included Ms. Arnold, in engaging in misconduct than other members  
7 were false and insufficient reason to disqualify Ms. Arnold and the entire Black members who the  
8 generalization of misconduct did not apply the Defendants action was based on generalizing race  
9 base discriminations.  
10

11 22. On or about August 22, 2022, Defendant David Kingsbury was being intentionally  
12 disparaging towards Ms. Arnold and Mr. Dunham and the entire black members with the  
13 Trademark Policy where only Blacks or African Americans Club was eliminated based on the  
14 Trademark Policy were the Defendant allowed white members to misuse the logo Trademark  
15 Policy in a discriminatory manner that did not violate the white associate rights of the organization  
16 or revoking other members charters.  
17

18 23. I believe the reason the Defendant Kingsbury terminated Ms. Arnold, membership was  
19 based on Ms. Arnold, being a member for less than 30 days and bear witness to the following: (1)  
20 possible poaching; of Mr. Dunham II Club Members; (2) Misappropriation of Project Funds; (3)  
21 Forcing Mr. Dunham to abandon his Mental Health Project; and his Mississippi’s Jacksonville  
22 water project; (4) including publishing club revocation to each and every member that was  
23 consider a gross violation of ethical policy in which Ms. Arnold, reported her concern to Mr.  
24 Kingbury were she said discriminatory practices should not be allowed to continue against Mr.  
25 Dunham.  
26

27 24. Defendants Trina Charles wrongfully invoked violating Ms. Arnolds, civil rights and  
28

1 constitutional rights to freedom of speech as it relates to Natural Disaster Fraud Policy were Ms.  
 2 Arnold, was contacted by Plaintiff Mr. Dunham, being suspicious of the Defendant Triana  
 3 infringing into Mr. Dunham's Jackson Mississippi water project in which Ms. Arnold, was asked  
 4 to listen to the conversation between the Defendant Ms. Charles and Plaintiff Mr. Dunham, as  
 5 she claimed financial assistance, and public donation not specifically for [all]the resident of  
 6 Jackson Mississippi but for her family members who supposably also lived in Mississippi, where  
 7 Ms. Arnold, listened respectfully to the conversation between the Defendant Ms. Charles and the  
 8 Plaintiff Mr. Dunham, and was long before Ms. Arnold, suspected Ms. Charles had stolen the  
 9 Mississippi water project ideal from the Plaintiff Mr. Dunham were she intended to solicit  
 10 donation, water and relief funds just for her family in Jacksonville Mississippi not at any time  
 11 was the Plaintiff yelling or threatening the Defendant Ms. Charles. the Trina.  
 12  
 13

14 25. The Jackson Mississippi water campaign did not come forth by the Defendant Traina,  
 15 own ingenuity but by the challenging work of Plaintiff Mr. Dunham and Ms. Arnold where the  
 16 Defendants Triana Charles, with the help of the David Kingbury are being sued for  
 17 violating the Plaintiff Ms. Arnolds, and Mr. Dunham rights to freedom of speech, civil rights  
 18 violation by intentional alienation the Plaintiffs Arnold from preventing social service ideals  
 19 from being copied and misused as Natural Disaster waste, fraud or scams where the Defendant  
 20 Ms. Charles, provided false statement related to Ms. Arnold, engaging in-inappropriate and  
 21 aggressive conduct over the phone on September 13, 2022, concerning the Jackson Mississippi,  
 22 water project.  
 23  
 24

25 26. Ms. Arnold, alleges that every material fact in Ms. Trina letter is untrue as the Plaintiff  
 26 more than likely through recording, personally wittiness who heard the conversation that  
 27  
 28

1 t the Defendant Trina Charles, written statement was false and defamatory was a false account of  
2 the event mis-portraying Plaintiff Ms. Arnold, conduct as someone who was being aggressive  
3 towards the Defendant.

4  
5 27. The actions of Defendant Ms. Charles were wrongful, malicious, and designed to  
6 embarrass and damage Plaintiff. Plaintiff suffered extreme mental and emotional anguish as a  
7 result of Defendant's wrongful action. Both Plaintiffs incurred loss of membership as a result of  
8 Defendant's deliberate and malicious conduct.

9  
10 28. Both Ms. Arnold and Mr. Dunham II, has suffered harm to his and her reputation.  
11 including open humiliation among club members, embarrassment, mental anguish and distress  
12 by being singled out by the Defendants Trina and the help of Defendant Kingbury, who  
13 published a copy of the Defendants letter to every Lion Club Member through written email and  
14 LCI-Notice putting the Plaintiff Club on Status Quo (sees attachments (See Exhibit A).

15  
16 29. Plaintiff Ms. Arnold and Mr. Dunham would show that the actions of Defendant herein  
17 reflect a malicious, intentional, willful, and reckless disregard of the rights of Plaintiff herein and  
18 warrant an award of punitive damages to Plaintiff Ms. Arnold believes she is entitled to a  
19 judgment of and against Defendant Ms., Trina, and Defendant David Kingbuty for compensatory  
20 and punitive damages.

21  
22 30. Defendant Lion's Club International Association ("Lion's Club International") is a  
23 worldwide civic and humanitarian organization with approximately 1.4 million global members  
24 and countless local clubs around the world, including in the state of Connecticut.

25 31. Lion's Club International actively recruits members who join by paying nominal dues.

26 32. Membership in Lion's Club International is not exclusive and has minimal requirements.  
27 Members must be at least 18 years of age and interested in helping better the community.  
28



1 33. In consideration of members' dues, Lion's Club International connects members to local  
2 Lion's Club chapters in their communities and provides social networking opportunities.

3 34. Plaintiff Roland Dunham II is a Black male and was a member of Defendant Lion's Club  
4 International since second-generation member in-good- standings for five years; that included  
5 loss \$10,000.00 in training and pins for exclusive club.  
6

7 35. On or about June 5, 2019, Mr. Dunham founded a local Lion's Club chapter, the New  
8 London Black Heritage Club, for the purpose of serving the Black community in Connecticut  
9 and in other places of need.  
10

11 36. Approximately thirty members in addition to Mr. Dunham and Ms. Arnold joined the  
12 New  
13 London Black Heritage Club.

14 37. Membership in this Lions club acquired by invitation only. Ms. Arnold paid in dues to  
15 Defendant Lion's Club International where Mr. Dunham, a member in good standing who  
16 sponsor, the Plaintiff Kimbly Arnold into the club where Ms. Arnold, was the Club Secretary.  
17

18 38. By paying dues and charter fee to Defendant Lion's Club International, Mr.  
19 Dunham and Ms. Arnold, each are ere entitled to the benefits of a membership contract with  
20 Lion's Club International.

21 39. Benefits of the membership contract included access to Defendant Lion's Club  
22 International's social networks, support from Lion's Club International for project planning,  
23 Lions provide services to beneficiaries in their communities or around the world; coordinates  
24 partnership agreements involving LCI service programs or initiatives in conjunction with LCIF  
25 activities and funded.  
26

27 40. Mr. Dunham, Ms. Arnold, and the New London Black Heritage Club raised  
28



1 approximately \$10,000 from donations for a project to assist the Black community in Jackson  
2 Mississippi with Mississippi Water Project.

3 41. On or about July 22, 2022, a club dispute had risen regarding Defendant Floersia request  
4 to be transferred to a nonblack club [ The Niantic Club) where the Defendant Florisa was not in  
5 good standing due to the following reason: (1) the defendant Florisa had abandoned July 30,  
6 2022, Educational Outreach Project in which she had received \$1,000.00 and failed to return the  
7 funds or Plaintiffs Property; (2) The Plaintiff Ms. Arnold and Mr. Dunham II refused the  
8 Defendants Ms. Florisia member's transfer due to the Defendant indebtedness to the Black  
9 Heritage Club dues and fees were not paid since June, July the Plaintiffs Ms. Arnold and Mr.  
10 Dunham II, decided to withhold/deny member request to transfer. (see Exhibit B)

11 42. On or about August 10, 2022, Defendant Susan Fisher commenced with undermining the  
12 club rule by willfully displaying discriminatory practice against the Mr. Dunham II in favor of  
13 non-black. Lion Club member Kirk where the Defendant Florsia, while in bad standing was still  
14 allowed to be transferred to the Non-Black club without curing the members fees, returning  
15 property to the Plaintiffs. (See Exhibit B-3)

16 43. On or about August 9, 2022, Defendant Susan Fisher, and Defendant David Kingsbury  
17 informed Mr. Dunham that the Legal Division had received complaint from members of his  
18 community and video and misuse of Lions Logo and how the Plaintiffs Mr. Dunham II was in  
19 breach of "Club Obligation where he was to remain in good standing, and shall abide by the  
20 following: (c) **"Abide by the constitution, by-laws, and the policy of the international Board  
21 of Directors"** notice sent to the Plaintiff Mr. Dunham II, on as constructive retaliatory manner  
22 in response to Mr. Dunham refusing to transfer the Defendant Florisa to Nonblack club who  
23 misused Mr. Dunham II educational project funds..(See Exhibit B-Misuse of Funds)

1 44. On or about September 30, 2022, Defendant\* Susan Fisher, and Defendant David  
2 Kingsbury informed Mr. Dunham that the New London Black Heritage Club's membership  
3 charter was being revoked and that the club no longer had any affiliation with the Lion's Club  
4 International.

5  
6 45. Defendants Fisher and Kingsbury wrongfully revoked the New London Black Heritage  
7 Club's charter for the pretextual reason that the club had not paid its dues.

8 46. Defendants Fisher and Kingsbury were motivated by intentional ethnicity and race  
9 discrimination  
10 when they revoked the New London Black Heritage Club's charter.

11  
12 47. During the time period relevant to this pleading, the New London Black Heritage Club  
13 was the only Lion's Club International-affiliated club in the State of Connecticut focused on the  
14 Black community receiving extended services need base services such as mental health project.

15 48. During the time period relevant to this pleading, there existed Lion's Club International-  
16 affiliated clubs in Connecticut focused on other ethnic and racial communities, including white  
17 harbor lions club, and 250 Confederate Anniversary Celebration.

18  
19 49. Defendant Lion's Club International was aware of the wrongful actions of Ms. Fisher and  
20 Mr. Kingsbury and failed to prevent the revocation of the New London Black Heritage Club's  
21 charter, even after Plaintiffs paid \$250.00 for their complaint to also be heard; that was  
22 overlooked, intentionally ignored by the Defendants Lion Club International Legal Counsel.

23  
24 50. Due to Defendants' interference with Mr. Dunham's contract rights on the basis of his  
25 race, Mr. Dunham suffered significant economic loss, emotional harm, and the painful severance  
26 of his proud identity as a Lion and active member serving his community.

27 51. Due to Defendants' MaryAnn, and Trian Charles interference with Mr. Dunham Club  
28

1 contract rights on the basis of refusing to participate in Women King Project or Movie event base  
2 on past slavery acts Mr. Dunham was harassed, and defamed by both Defendants Ms. MaryAnne  
3 and Ms. Charles, were false statement was written to the Defendant Kingbury and Defendant Sue  
4 Fisher; slandering the Plaintiff Dunham and Ms. Arnold reputation in the in the community  
5 causing them both to equally to loss his charter; and Ms. Arnold, to loss her contract rights to  
6 membership services.  
7

8 52. Due to Defendants' interference with Ms. Arnold's contract rights on the basis of her  
9 constitutional freedom of speech and civil rights Ms. Arnold suffered emotional pain and  
10 suffering.  
11

12 **FIRST CAUSE OF ACTION AGAINST ALL DEFENDANTS**  
13 **Race Discrimination (42 U.S.C. § 1981)**

14 53. Plaintiffs repeat and reallege the foregoing paragraphs as if set forth fully herein.

15 54. Plaintiffs are members of a racial minority because they identify as Black.

16 55. On or about August 9, 2022, Defendants collectively intentionally discriminated  
17 against Plaintiffs on the basis of race by wrongfully revoking the charter of the New London  
18 Black Heritage Club and depriving Plaintiffs of the benefits of their membership in Lion's Club  
19 International.  
20

21 56. Defendants' discrimination concerned Plaintiffs' right to make and enforce contracts.

22 57. Plaintiffs allege circumstances that give rise to an inference that Defendants were  
23 motivated by racially discriminatory intent.

24 58. Defendants' intentional race discrimination caused Plaintiffs to suffer economic damages  
25 and emotional harm.  
26

27 **SECOND CAUSE OF ACTION AGAINST ALL DEFENDANTS**  
28 **Violation of First & Fourteenth United States Constitutional Amendment**  
**Right with Restriction and False Statements**

1  
2 60. Plaintiffs Kimbly Arnold and Plaintiffs Mr. Dunham II, repeat and reallege for its  
3 complaint the foregoing paragraphs as if set forth fully herein.

4 61. Plaintiffs are members of a racial minority because they identify as Negroes and Black  
5 Lion Members bring this action challenging the constitutionality and the right to free speech  
6 against: (1) Lions Club Discriminatory Practices; (2) Mary Ann Martinez and the Right to  
7 Boycott Woman King; (3) Trina Charles Constitutional Restriction of Speech Against the Right  
8 to Boycott the Woman King Movie and to Protect the Jackson Mississippi Natural Disaster  
9 Project being copied and exploited by the Defendants Ms. Charles.in which the Defendants .  
10 On or about August 9, 2022, Defendants collectively intentionally violated the Plaintiffs First  
11 Amendment Rights against the Plaintiffs on the basis on (i) open disputes of racism, hateful  
12 practices(ii) extremis or radicalization of Women King Movie (iii) disinformation or false and  
13 misleading information, (iv) targeting and harassment and publicizing retaliatory action taken  
14 against the Plaintiffs for the purposes of causing open humiliation and embarrassment.  
15

16  
17 62. Defendants' violating the Plaintiffs right to speak-up against historical patterns of  
18 discrimination; including speaking against unfairly exploiting natural disaster funds and water  
19 campaigns concerned Plaintiffs' right to rise a dispute causing the Defendants to wrongfully  
20 revoke the charter of the New London Black Heritage Club and depriving Plaintiffs of the  
21 benefits of their membership in Lion's Club International.  
22

23 63. Defendants violated the First Amendment of the United States Constriction and Article I,  
24 Section 2, of the California Constitution with restricting Plaintiffs' right to make and enforce  
25 culture services against their will, impermissibly interfered with the Plaintiff Ms. Arnold and Mr.  
26 Dunham positionality-to-be protected against constructive threats of club violation and charter  
27 removal violated Mr. Dunham's' freedom of speech rights to constitutional protection.  
28

64 Plaintiffs Mr. Dunham allege circumstances that given rise to the Defendants LCI- and  
Defendant Mary Anne and Defendant Ms. Charles, inference were motivated by removing the  
Defendants speech against “Boycotting the Women King Movie” that the Defendants deemed  
undesirable or harmful practices to their bias community policies; and have now created a “New  
Club” commandeering Black American Lion Clubs History, Heritage for exploitation.  
Defendants’ intentional ethnicity/ race discrimination caused Plaintiffs to suffer economic  
damages and emotional harm.

65. Defendants Lion Club International Board of Director October 6, 2022, meeting was held  
reviewing alleged “willful violation of association’s policy; and/or false claims the Plaintiffs Mr.  
Dunham “lack of action” to rectify alleged policy violation and “several complaints from  
members in the community” was defamatory falsehood and false allegations as the Defendants  
LCI-board review violated connotational standards of the 14<sup>th</sup> Amendment (1868) of the  
Constitution of the United States in that the Defendants LCI- Board of Directors violated the  
laws of due process in which the Defendants LCI- Board violate the Plaintiffs Mr. Dunham  
Rights to Dispute Resolution Procedures (DRP) internal mechanism for resolving disputes  
without the need for a formal evidentiary hearing.. (See Exhibit C).

66. The Defendant LCI- Board of Directors intentionally violated the Plaintiffs Mr. Dunham’s II  
and Mr. Arnold First and Fourteenth Amendment of the Constitution of the United States on or  
about October 2022 the Defendant LCI- Board and “The Constriction and By-Laws Committed  
held a formal evidentiary hearing were they evaluated “ the evidence of the club’s supposedly  
Continued use of unauthorized trademark, as well as several complaints from members  
unspecified members in the community” which lead to the Defendant LCI falsely placing the  
Club in status quo position . (see Exhibit C)

1 67. Plaintiff would show the willful intentional acts of Defendant LCI- Board of Directors  
2 constitute malicious violation of the Plaintiffs civil right and constitutional entitlement to a  
3 judgment of and against Defendant for compensatory and punitive damages for formally and  
4 informally denying the Plaintiffs equal rights and consideration to dispute evidence the following  
5 evidence: (1) two complaints; (2) email exchanges;(3)and/or screen shots of text messages from  
6 individual associated with two independent non-profit organizations in the New London area. In  
7 which the Constitutional Complaint Procedure denied the Plaintiffs Mr. Dunham and Ms. Arnold  
8 who paid the Defendant \$250.00 for the right to be heard and to defend themselves against  
9 allegation was denied or intentionally being disgraced or ignored which resulted in the Plaintiffs  
10 Mr. Dunham and Ms. Arnold First Amendment Freedom of Speech and Fourteenth Amendments  
11 to equal access to legal services being violated. (See Exhibit C and Exhibit D)  
12

14 68. Defendants equally denied the Plaintiff Dunham II rights as African American to rise  
15 claims complaints about most controversial club members poaching other clubs-members that  
16 were not in good standing that was extremely controversial and inherently subject to the  
17 Plaintiffs disagreeing with the Defendant LCI formal hearing where the Plaintiffs was not  
18 allowed to attend or speak against the complaints the Plaintiff is entitled to a Judgment of and  
19 against Defendant for compensatory and punitive damages for violation of the Plaintiffs  
20 Constitutional Rights.  
21

23 69. Plaintiff would show the willful intentional acts of Defendant constitute malicious false  
24 allegation where false statements alleged that the Plaintiff Mr. Dunham on a phone call to staff  
25 an "unspecified staff member" became aggressive, threatening, and disrespectful to others" and  
26 went as far to call them? (unknown staff) member "racist" and "White supremacist" were false  
27 and intentional said in order to inflict emotional distress and libel and slander Plaintiff Mr.  
28

1 Dunham is entitled to a judgment of and against Defendants for compensatory and punitive  
 2 damages as the Defendant LCI- committed removed the Plaintiffs as "lion" and prohibited from  
 3 membership without formal hearing violated the Plaintiffs constitutionally rights protecting him  
 4 and her against retaliatory threats resulting in the club being revoked was unconstitutional. (see  
 5 Exhibit c and D)  
 6

### 7 RELIEF

8 WHEREFORE, Plaintiff brings this action against Defendant LCI, Defendants Susan Fisher  
 9 who falsely reported unpaid club dues was the reason the Plaintiffs Mr. Dunham club was revoke  
 10 and demands judgment in the sum of \$500,000.00 compensatory damages and \$100,000.00  
 11 punitive damages as the false allegation continues, in debt-ness of \$1000.00 has not been  
 12 returned; and intellectual property of copying "Black Culture" "Black Heritage"; including the  
 13 ongoing copyright culture infringement; and culture "Misusing Black-likeness" and copying  
 14 "Black Civil Rights Terms" practice by the Plaintiffs continue to be exploited to this day; and  
 15 limited cost for attorney fees all costs of these proceedings servicing.  
 16  
 17

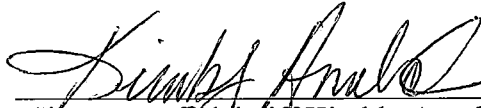
### 18 CERTIFICATION AND CLOSING


19 Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my  
 20 knowledge, information, and belief that this complaint (1) is not being presented for an improper  
 21 purposed, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;  
 22 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or  
 23 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so  
 24 identified, will likely have evidentiary support after a reasonable opportunity for further  
 25 investigation or discovery; and (4) the complaint otherwise complies with the requirement or  
 26 Rule 11.  
 27  
 28



1 I agree to provide the Clerk's Office with any changes to my address where case-related  
2 papers may be served. I understand that my failure to keep a current address on file with the  
3 Clerk's Office may result in the dismissal of my case.  
4

5  
6 Date of Signing: July 24, 2024

7  
8   
9 Signature of Plaintiff Kimbly Arnold Law Student  
(in Pro Per)

10   
11 Signature of Plaintiff Roland Dunham II (in Pro Per)  
12  
13  
14  
15  
16  
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